

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION

MIKELA JACKSON, and)
JEAN KELLY,)
)
Plaintiffs,)
)
vs.) Cause No.: 1:22-cv-00110-AGF
)
CITY OF SIKESTON, et al.,)
)
Defendants.)

PLAINTIFFS' SECOND SET OF REQUESTS FOR PRODUCTION TO
ALL DEFENDANTS

Pursuant to Fed. R. Civ. P. 34, Plaintiffs hereby submit the following Requests for Production to all Defendants. Plaintiffs request that Defendants serve their responses, along with the corresponding documents and/or materials, to the undersigned counsel for Plaintiffs at 222 W. Gregory Blvd., Suite 232, Kansas City, Missouri 64114, within 30 days of service of these Requests for Production.

DEFINITIONS

1. **“Subject occurrence”** shall mean and shall refer to the April 29, 2020 occurrence described in Plaintiff’s Complaint at Law.
2. **“You,” “Your,”** and **“Defendant”** shall mean and shall refer to any Defendant who has documents and materials responsive to each request.
3. **“Document”** means any handwritten, typewritten, recorded, or graphic matter however produced or reproduced, whether or not in the possession, custody, or control of the Defendants, and whether or not claimed to be privileged against discovery on any ground, including but not limited to, all contracts, reports, books, records, lists, memoranda, correspondence, telegrams, telexes, appointment calendars, diaries, schedules, films, videos,

photographs, sound recordings, signed or unsigned documents, any and all prison/jail records, as well as sent or unsent drafts of documents. “**Document**” shall also mean and include the original and every copy regardless of origin or location.

4. If any information is withheld under a claim of privilege or other exclusion from discovery, state the nature of the information or document withheld, the privilege or other exclusion that is claimed, and the facts upon which the claim of privilege or exclusion is based.

REQUESTS

Please provide any and all documents in any way relating to the incident complained of herein, including but not limited to the following:

1. Any and all landline and cell phone records (including both cell phones provided by the City and personal cell phones) for each of the named defendants, including incoming and outgoing phone calls and incoming and outgoing text messages from April 29, 2020 through May 2, 2020. In the alternative, each defendant may complete and sign the attached telephone records authorization form.
2. Any and all emails sent and received by any of the named defendants and any member of the City of Sikeston DPS that in any way relate to Denzel Taylor.
3. Any and all text messages sent and received by any of the named defendants and any member of the City of Sikeston DPS that in any way relate to Denzel Taylor.
4. Any and all documents and materials in your possession indicating that D.T., A.T., and B.T. and are not Denzel Taylor’s biological children.
5. Any and all documents and materials in your possession you have gathered in response to any authorization provided to you and signed by either plaintiff.

These Requests for Production of Documents are deemed continuing up to and through the time of trial.

Respectfully submitted,

/s/ Melissa K. Donlon

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CERTIFICATE OF SERVICE

I hereby certify that on June 20, 2023, the foregoing was served via electronic mail upon the following counsel of record:

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/s/ Melissa K. Donlon
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